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15 *Attorneys for ARCHER WESTERN CONTRACTORS, LLC*

16 **IN THE UNITED STATES DISTRICT COURT
17 DISTRICT OF NEVADA**

18 FISK ELECTRIC COMPANY,

19 Plaintiff/Counterclaim Defendant,

20 v.

21 ARCHER WESTERN CONTRACTORS, LLC,

22 Defendant/Counterclaim Plaintiff,

23 v.

24 SAFECO INSURANCE COMPANY OF
25 AMERICA,

26 Counterclaim Defendant.

27 CASE NO.: 2:20-cv-02341-GMN-DJA

28 **AGREED STIPULATION AND
PROPOSED ORDER
TO EXTEND DEADLINE
FOR JOINT PRETRIAL ORDER**

29 ARCHER WESTERN CONTRACTORS, LLC,

30 Third-Party Plaintiff,

31 v.

32 GALLAGHER-KAISER CORP.; ARCH
33 INSURANCE COMPANY,

34 Third-Party Defendants.

1 GALLAGHER-KAISER CORP.,

2 Third-Party Defendant/United States of
3 America, for Use and Benefit of
4 Gallagher-Kaiser, Third-Party
Counterclaimant,

5 v.

6 ARCHER WESTERN CONTRACTRS, LLC;
7 AND TRAVELERS CASUALTY AND
8 SURETY COMPANY OF AMERICA,

9 Third-Party Plaintiff/Third-Party
Counterclaim Defendants.

**10 AGREED STIPULATION AND
11 PROPOSED ORDER
12 TO EXTEND DEADLINE
13 FOR JOINT PRETRIAL ORDER**

14 The current deadline for the Joint Pretrial Order in this case is March 17, 2022. (ECF 80.) On
15 February 23, 2022, the Court ordered the parties to participate in settlement conferences in two related
16 cases. Per the Notice of Related Cases filed in this case (ECF 43), the two other related cases are: *Desert*
17 *Mechanical, Inc. v. Travelers Casualty and Surety Company of America, et al.* (Case No. 2:15-cv-02298-
18 GMN-DJA) (“DMI Lawsuit”) and *Archer Western Contractors, LLC v. Gallagher-Kaiser Corporation,*
19 *et al.* (Case No. 2:21-cv-00402-GMN-DJA) (“GK Lawsuit”). Currently, there is a Settlement
20 Conference scheduled for the DMI Lawsuit on April 12, 2022 (DMI Lawsuit, ECF 110) and for the GK
21 Lawsuit on May 4, 2022 (GK Lawsuit, ECF 32). Currently, there is no Settlement Conference scheduled
22 in this case. However, the cases are Related (ECF 43) and the Scheduling Orders in each Related case
23 have set the same deadlines.

24 Considering the Court’s Orders for Settlement Conferences and that successful settlement will
25 avoid the need for any joint pretrial order, the Parties in this and the two related cases have agreed and
26 hereby stipulate to this proposed order extending the deadline for the Joint Pretrial Order until 30 days
27 after the Settlement Conference is conducted in the DMI Lawsuit. The Parties have agreed and request
28 the 30-day extension rather than setting a date-certain because some of the Parties have conflicts with
more details and/or proposed alternate dates.

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1 This time extension will conserve the resources of the parties and the court.

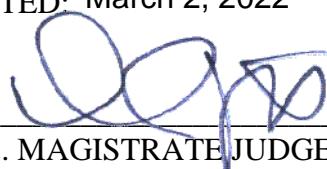
2 Respectfully Submitted,

3 DATED: March 1, 2022

<p>4 KRAFTSON CAUDLE</p> <p>5</p> <p>6 _____ <i>/s/ Jonathan J. Straw</i></p> <p>7 LARRY W. CAUDLE, JR.</p> <p>8 Admitted Pro Hac Vice</p> <p>9 JONATHAN J. STRAW</p> <p>10 Admitted Pro Hac Vice</p> <p>11 1600 Tysons Boulevard, Suite 250</p> <p>12 McLean, Virginia 22102</p> <p>13 <i>Attorneys for Archer Western Contractors, LLC</i></p>	<p>4 THE ALLISON LAW FIRM CHTD.</p> <p>5</p> <p>6 _____ <i>/s/ Heather C. Fleming</i></p> <p>7 NOAH G. ALLISON (#6202)</p> <p>8 HEATHER C. FLEMING (#14492)</p> <p>9 3191 East Warm Springs Road</p> <p>10 Longford Plaza East, Building 13</p> <p>11 Las Vegas, Nevada 89120</p> <p>12 <i>Attorneys for Fisk Electric Company and</i></p> <p>13 <i>Safeco Insurance Company of America</i></p>
<p>11 LAW OFFICES OF HAYES & WELSH</p> <p>12</p> <p>13 _____ <i>/s/ Martin L. Welsh</i></p> <p>14 MARTIN L. WELSH (#8720)</p> <p>15 199 North Arroyo Grande Blvd., Suite 200</p> <p>16 Henderson, Nevada 89074</p> <p>17 <i>Attorneys for Archer Western Contractors, LLC</i></p>	<p>11 PEEL BRIMLEY, LLP</p> <p>12</p> <p>13 _____ <i>/s/ Steven D. Meacham</i></p> <p>14 STEVEN D. MEACHAM (#9863)</p> <p>15 3333 East Serene Avenue, Suite 200</p> <p>16 Henderson, Nevada 89074</p> <p>17 <i>Attorneys for Gallagher-Kaiser Corp. and Arch</i></p> <p>18 <i>Insurance Company</i></p>
<p>16 THE FAUX LAW GROUP</p> <p>17</p> <p>18 _____ <i>/s/ Jordan F. Faux</i></p> <p>19 JORDAN F. FAUX (#12205)</p> <p>20 2625 North Green Valley Pkwy, Suite 100</p> <p>21 Henderson, Nevada 89014</p> <p>22 <i>Attorneys for Travelers Casualty and Surety</i></p> <p>23 <i>Company of America (Surety for Archer</i></p> <p>24 <i>Western Contractors, LLC)</i></p>	

22 **IT IS SO ORDERED.**

23 DATED: March 2, 2022

24 
U.S. MAGISTRATE JUDGE